



Rocky Mountain
Remediation Services, L.L.C.
protecting the environment

Rocky Flats Environmental Technology Site
10808 Highway 93, Unit B
Golden, Colorado 80403-8200
Phone (303) 966-7000



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CORRES CONTROL	
LTR NO	
K-H Corres #	
99-RF-	
Originator Ltr Log #	
TAH-015-00	
DIST	LTR/ENC
BODEY E D	
CARMEAN, C.H.	
CRAWFORD A.C.	
HAUG, D G.	
HUGHES F.P	
JENKINS K D	
KASEN J. A.	
KORENKO M. K.	
LAW J.E.	
McPHERSON, B	X X
MILLS, S H	
OVERLID T W	
PATTERSON J.W	
SUTTON, S R.	
TRICE, K D	X X
WHEELER, M	
WOLF K Z	X X
WOLF H C.	X X
BAKER, T C	X X
CATHEL, R.L.	X X
HOPKINS T.A.	X X
LANGLOIS, L.A.	X X
LONDON K.C.	X X
URBAN, D.L.	X X
VANTYMEN	X X
ADMIN RECORD	X X
RMRS RECORDS	X X
TRAFFIC	
PATS/T130G	
CLASSIFICATION:	
UCNI	
UNCLASSIFIED	X X
CONFIDENTIAL	
SECRET	
AUTHORIZED CLASSIFIER	
SIGNATURE:	
<i>Ted A Hopkins</i>	
Date: 2/17/00	
IN REPLY TO RF CC NO	
ACTION ITEM STATUS.	
q PARTIAL/OPEN	
q CLOSED	
LTR APPROVALS	
ORIG. & TYPIST INITIALS	
TCB.dlu	
RF-46488(Rev 1/99)	

February 17, 2000

Karan North, Division Manager
Environmental Systems and Stewardship
Kaiser-Hill Company, L L C
Building T130C

REQUEST FOR APPROVAL OF SUMMARY REPORT OF FINAL RCRA
CLOSURE ACTIVITIES FOR CONTAINER STORAGE UNIT 90 97 IN
BUILDING 771 - TAH-015-00

Rocky Mountain Remediation Services submits the attached *Summary Report for Final RCRA Closure Activities for Container Storage Unit 90 97 in Building 771 (RF/RMRS-2000-025 UN)* It contains a description and other information necessary to complete the closure of Unit 90 97, which had been partially closed under the *RCRA Closure Plan [for] Mixed Residue Container Storage Units* (November 1995) and the *Certification of Partial Closure [of] RCRA Unit 90 97 (Room 147, Building 771), Revision 1, April 1998*

The Summary Report also contains information ordinarily contained in a Closure Description Document, along with the declaration that Unit 90.97 is now clean closed by the method of Unit Removal Because of the unusual circumstances associated with this unit, approval is requested from CDPHE for this dual-purpose report

Please submit this Summary Report and request for approval to CDPHE at your earliest convenience A draft letter to CDPHE will be provided for your use

If you have questions, please contact me at 303-966-7652 or Tom Baker at 303-966-4329

Ted A Hopkins

Ted A. Hopkins
Environmental Compliance Manager

TCB.dlu

Attachments (2)
As Stated

ADMIN RECCRD



00-RF-XXXXX

Mr Steve Tarlton, RF Oversight Team Unit Leader
Federal Facilities Program
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

REQUEST FOR APPROVAL OF SUMMARY REPORT OF FINAL RCRA CLOSURE
ACTIVITIES FOR CONTAINER STORAGE UNIT 90.97 IN BUILDING 771 -
KN-XXX-00

Dear Mr Tarlton

Kaiser-Hill Company, L L C submits the enclosed *Summary Report of Final RCRA Closure Activities for Container Storage Unit 90 97 in Building 771*, based on the *RCRA Closure Plan for Interim Status Units* (July, 1998) (Closure Plan) It contains a description and other information necessary to complete the closure of Unit 90 97, which had been partially closed under the *RCRA Closure Plan [for] Mixed Residue Container Storage Units* (November 1995) and the *Certification of Partial Closure [of] RCRA Unit 90 97 (Room 147, Building 771), Revision 1, April 1998* The Summary Report also contains information ordinarily included in a Closure Description Document, along with the declaration that Unit 90 97 is now clean closed by the method of Unit Removal

Because of the unusual circumstances associated with this unit, Kaiser-Hill requests approval of this dual-purpose report If you have any questions, please contact Tom Baker of Rocky Mountain Remediation Services at 303-966-4329

Karan North, Division Manager Date
Environmental Systems & Stewardship
Kaiser-Hill Company, L L.C.

cc:

C Gilbreath	-	CDPHE
D Grosek	-	DOE, RFFO
J.E Springer	-	DOE RFFO
F.J Phillips	-	Kaiser-Hill
T.C. Baker	-	RMRS
T. A Hopkins	-	RMRS
R. McPherson	-	RMRS
K.Z Wolf	-	RMRS
R M Leitner	-	Proctor's Enterprise
C M Madore	-	Environmental Compliance Services
N C T Van Tyne	-	IT Corporation

Summary Report of
Final RCRA Closure Activities for
Container Storage Unit 90.97
in Building 771

U.S. Department of Energy
Rocky Flats Environmental Technology Site
EPA ID No. CO7890010526

Prepared by:

T C Baker

T C Baker, Environmental Compliance, RMRS

2/17/00
Date

REVIEWED FOR CLASSIFICATION/UCNI

By *St. Mathiasmeier*

Date *02-17-00*

(u, Na)
Classification
Analysis

1.0 INTRODUCTION AND PURPOSE

This summary report contains a description of activities and other information necessary to complete the closure of RCRA Unit 90 97, which was a container storage unit in Building 771 of the Rocky Flats Environmental Technology Site (RFETS). The unit had been partially closed under the *RCRA Closure Plan [for] Mixed Residue Container Storage Units* (November 1995). This partial closure was documented in the *Certification of Partial Closure [of] RCRA Unit 90 97 (Room 147, Building 771), Revision 1, April 1998*, which was enclosed with transmittal letter 98-RF-10657 (5/13/98).

Final RCRA closure activities were deferred to D&D activities under the Rocky Flats Cleanup Agreement. At the time of unit removal, these activities were subject to the *Building 771/774 Closure Project Decommissioning Operations Plan* and the *Closure Plan for Interim Status Units (July 1998)* (Closure Plan). Section B 3 of the Closure Plan stipulates that the Colorado Department of Public Health and Environment (CDPHE) is to be notified of the intent to perform partial or final closure of any interim status unit prior to the start of closure activities.

Unintentionally, RFETS failed to provide CDPHE with a timely notification and supplemental information about the completion of closure activities for RCRA Unit 90.97. Therefore, this summary report will provide the details about closure activities normally presented in a Closure Description Document.

2.0 UNIT DESCRIPTION

This unit consisted of 27 wall-mounted cylindrical steel storage bins with hinged lockable covers. The volume of each bin was approximately 9 liters. Each bin was also surrounded by lead shielding that was at least 0.1 inches thick. A drain hole at the bottom of the bin, drilled through both the lead and steel layers, prevented the accumulation of liquids inside the bin. The bins were used to store containers of various materials for the package counter, and some of these materials had been identified as mixed residues. One container could be stored inside each bin.

The original closure strategy for the bins was to clean them and then to test the final rinsate against a closure performance standard consisting of non-detectable levels of organic constituents (benzene, carbon tetrachloride, tetrachloroethylene, methylene chloride, toluene, methyl ethyl ketone, 1,1,1-trichloroethane and trichloroethylene) and levels of toxicity characteristic metals (i.e., arsenic, barium, cadmium, chromium, lead,

mercury, selenium and silver) at or below the background level in the unused rinsate solution. In addition, the rinsate was not to exhibit any characteristic of a hazardous waste.

Closure activities commenced during the summer of 1997, when the bins were cleaned and rinsed, and the final rinsates for groups of bins were analyzed against the closure performance standard. The closure was originally certified as complete in November 1997, but this certification was later rejected by CDPHE. A revised report was then submitted with the declaration that 11 of the bins were now clean closed, and that closure of the remaining 16 bins was to be deferred until their removal as part of decommissioning activities, due to the presence of lead and cadmium in the rinsate. The performance standard for organic constituents was met for all 27 storage bins, indicating that there were no listed wastes present in the unit.

3.0 DESCRIPTION OF CLOSURE ACTIVITIES

Unit 90 97 was located within D&D Set 35. Work activities for D&D Set 35 were conducted under IWCP work package number T0100820. During July 1999, the lead-wrapped storage bins were separated from the wall. At that time, each storage bin was individually cut free from the wall mounting using a Sawz-All™. The separation was made at the wall. The steel wall mounting was then cut free from the bin and disposed as non-hazardous light metal (a low-level waste). The lead wrapped storage bins were placed into a half crate with other lead objects. The crate and its contents were determined to meet the requirements for transportation as a Surface Contaminated Object (SCO). The crate was moved into a RCRA permitted storage area onsite until a disposal or recycle path is determined.

In the revised certification report, it was stated that the ultimate packaging and disposal of all of the storage bins would be as low level mixed waste. At the time of removal, a decision was made not to separate the lead from the steel bins, due to concerns about possible release of radioactive contamination. Therefore, all 27 bins were packaged as low level mixed waste and were characterized with EPA waste code D008 (lead). The removal and packaging of the bins was verified through interviews with the D&D workers who performed the closure activities.

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4.0 SUMMARY

With the removal of the 16 remaining RCRA-regulated storage bins, the requirements of the Closure Plan for closure have been fulfilled for Unit 90 97 in Building 771, as described above. Therefore, RCRA Unit 90 97 is now closed by the method of Unit Removal.